

## State Water Resources Control Board

July 13, 2017

(Via email and Certified Mail)  
**CERTIFIED MAIL**  
**NO. 7015 1520 0001 7928 4383**

Mr. Ernest Eugenio Jr.  
Manager, Oakland VMF  
United States Postal Service  
1675 Seventh Street, Room VMF  
Oakland, California 94615  
[ernesto.eugeniojr@usps.gov](mailto:ernesto.eugeniojr@usps.gov)

**SUBJECT: REVISED FAILURE TO COMPLY; UNDERGROUND STORAGE  
TANK SYSTEMS LOCATED AT UNITED STATES POSTAL SERVICE,  
1675 7<sup>TH</sup> STREET, OAKLAND**

Dear Mr. Eugenio:

As of the date of this letter, the State Water Resources Control Board (State Water Board) has not received a complete response to our May 11, 2017 Notice of Violation (NOV)(attached). You are directed to correct the ongoing violations identified in the NOV and submit compliance documentation to the State Water Board and Alameda County Department of Environmental Health within ten (10) days from the date of this letter.

Please send all compliance documentation to the following:

**State Water Board**

Ms. Rebecca Green  
UST Enforcement Unit  
Office of Enforcement  
State Water Resources Control Board  
801 K Street, Suite 2300  
Sacramento, California 95814  
[rebecca.green@waterboards.ca.gov](mailto:rebecca.green@waterboards.ca.gov)

**Local CUPA**

Ms. Aileen Mendoza  
Supervising Hazardous Materials Specialist  
Alameda County Department of  
Environmental Health  
1131 Harbor Bay Parkway  
Alameda, California 94502  
[aileen.mendoza@acgov.org](mailto:aileen.mendoza@acgov.org)

Failure to comply with this notice may result in an enforcement action by the State Water Board. The State Water Board reserves the right to bring an action against the owner and/or operator of the tank(s) in violation, or it may recommend that Alameda County Department of Environmental Health pursue enforcement, or Alameda County Department of Environmental Health may elect to pursue enforcement independently.

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at [amantha.henkel@waterboards.ca.gov](mailto:amantha.henkel@waterboards.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Amanda Henkel". The signature is stylized with a large, looping initial 'A' and a cursive 'H'.

Amantha Henkel  
Senior Environmental Scientist  
UST Enforcement Unit  
**Office of Enforcement**

Attachment: May 11, 2017 Notice of Violation

cc: *(via email only)*

Ms. Susan Hugo, Chief  
Hazardous Materials Division  
Alameda County Department of  
Environmental Health  
[susan.hugo@acgov.org](mailto:susan.hugo@acgov.org)

Ms. Aileen Mendoza  
Supervising Hazardous Materials Specialist  
Alameda County Department of  
Environmental Health  
[aileen.mendoza@acgov.org](mailto:aileen.mendoza@acgov.org)

## State Water Resources Control Board

May 11, 2017

(Via email and Certified Mail)

**CERTIFIED MAIL**

**NO. 7015 1520 0001 8017 2433**

Mr. Ernest Eugenio Jr.  
Manager, Oakland VMF  
United States Postal Service  
1675 Seventh Street, Room VMF  
Oakland, California 94615  
[ernesto.eugeniojr@usps.gov](mailto:ernesto.eugeniojr@usps.gov)

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS  
LOCATED AT UNITED STATES POSTAL SERVICE, 1675 7<sup>TH</sup> STREET,  
OAKLAND**

Dear Mr. Eugenio:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on April 26, 2017, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	<b>Failure to Maintain Operating Permit</b> – The permit to operate was not available at the time of inspection.	All	April 26, 2017	Ongoing	H&SC 25284(a)
2	<b>Failure to Maintain Facility Information (Form A)</b> – The facility information in CERS needs to be updated because it lists self-insurance, however this facility is exempt.	All	April 26, 2017	Ongoing	23 CCR 2711(a)
3	<b>Failure to Maintain Tank Information (Form B)</b> – The tank information pages in CERS need to be updated because there is a discrepancy between the names of the tanks in CERS and the names of the tanks on testing documents. The middle tank must list that it is also used for an emergency generator in the additional comments section.	All	April 26, 2017	Ongoing	23 CCR 2711(a)

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	<b>Failure to Maintain Site Map</b> – The site map in CERS does not include a scaled diagram or as-built drawing, which indicates the location of the UST (tank, piping, auxiliary equipment) with respect to buildings or other landmarks.	All	April 26, 2017	Ongoing	H&SC 25286(a); 23 CCR 2711(a)(8)
5	<b>Failure to Maintain Maintenance or Repair Records Onsite</b> – The records for the repair to the supply and return line on the emergency generator piping were not available at the time of inspection.	Middle Tank	April 26, 2017	Ongoing	H&SC 25293; 23 CCR 2712(b)
6	<b>Failure to Meet Designated Operator (DO) Inspection Requirements</b> – The alarm history report attached to the monthly DO inspection reports between April 22, 2016, and September 22, 2016, were not legible because of the small print of the photocopy; therefore, the inspector could not verify if any alarms occurred.	All	April 22, 2016	September 22, 2016	23 CCR 2715(c)
7	<b>Failure to Maintain Line Leak Detectors (LLD)</b> – The LLDs for the north and middle tanks failed testing on April 20, 2015, and on April 8, 2016. They were not repaired and retested until July 28, 2016.	North and Middle Tanks	April 20, 2015	July 28, 2016	H&SC 25291(f); 23 CCR 2636(f)(2)
8	<b>Failure to Perform Secondary Containment Testing</b> – The supply and return line for the emergency generator was not tested during the secondary containment test conducted on April 18, 2016.	Middle Tank	April 18, 2016	Ongoing	23 CCR 2637(a)
9	<b>Failure to Maintain Secondary Containment</b> – The piping sumps for the north and middle tanks failed the secondary containment test conducted on April 18, 2016. They have not been repaired or retested.	North and Middle Tanks	April 18, 2016	Ongoing	H&SC 25291(a)(2)
10	<b>Failure to Tag Monitoring Equipment</b> – The following monitoring equipment did not have a certification sticker: the sensor in under dispenser containment (UDC) 3/4, all three tank annular sensors, and all three LLDs.	All	April 26, 2017	Ongoing	23 CCR 2638(f)



No.	Violation	Tank	Start Date	Stop Date	Regulation
11	<b>Failure to Monitor Product Piping –</b> The sensors in all three piping sumps were unable to detect a leak at the earliest opportunity because they were not placed in a vertical position at the lowest point in the sump.	All	April 26, 2017	Ongoing	23 CCR 2630(d)
12	<b>Failure to Monitor Product Piping –</b> The sensors in the UDCs were unable to detect a leak at the earliest opportunity because they were not placed at the lowest point in the amplifier well.	All	April 26, 2017	Ongoing	23 CCR 2630(d)
13	<b>Failure to Maintain Equipment According to Manufacturers Instructions –</b> The middle tank piping sump lid had a broken hinge.	Middle Tank	April 26, 2017	Ongoing	23 CCR 2638(a)

**You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Alameda County Department of Environmental Health within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance. Please provide a copy of the monitoring certification conducted on April 13, 2017, as soon as you receive it.**

Please send all compliance documentation to the following:

**State Water Board**

Ms. Rebecca Green  
UST Enforcement Unit  
Office of Enforcement  
State Water Resources Control Board  
801 K Street, Suite 2300  
Sacramento, California 95814  
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Ms. Aileen Mendoza  
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Alameda County Department of  
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1131 Harbor Bay Parkway  
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If you have any questions, please contact me at (916) 341-5551, or by email at [amantha.henkel@waterboards.ca.gov](mailto:amantha.henkel@waterboards.ca.gov).

Sincerely,



Amantha Henkel  
Senior Environmental Scientist  
UST Enforcement Unit  
**Office of Enforcement**

cc: *(via email only)*

Ms. Susan Hugo, Chief  
Hazardous Materials Division  
Alameda County Department of  
Environmental Health  
[susan.hugo@acgov.org](mailto:susan.hugo@acgov.org)

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